



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

(AE-17J)

JAN 24 2006

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

James Monahan  
Vice President, Head of Technical Center  
Honeywell Analytics  
405 Barclay Blvd.  
Lincolnshire, IL 60069

Re: Notice of Violation  
Finding of Violation  
Honeywell Analytics  
Lincolnshire, Illinois

Dear Mr. Monahan:

The United States Environmental Protection Agency (U.S. EPA) is issuing the enclosed Notice of Violation (NOV)/ and Finding of Violation (FOV) to Honeywell Analytics (Honeywell). The NOV/FOV is being issued under Section 113(a)(1) and (a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(1) and (a)(3). We find that you are violating Title V of the Clean Air Act and the Illinois State Implementation Plan (SIP) at your Lincolnshire, Illinois facility.

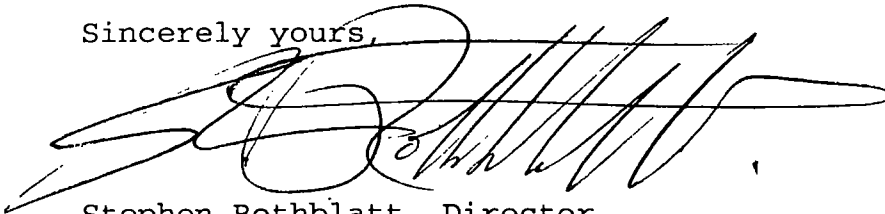
We have several enforcement options under Section 113(a)(1) and (a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(1) and (a)(3). These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the NOV/FOV.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The U.S. EPA contact in this matter is Shannon Downey. You may call her at (312)353-2151 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,

A large, stylized handwritten signature in black ink, appearing to read 'S. Rothblatt', is written over the 'Sincerely yours,' text.

Stephen Rothblatt, Director  
Air and Radiation Division

Enclosure

cc: Julie Armitage, Acting Manager  
Compliance and Enforcement Section Bureau of Air  
Illinois Environmental Protection Agency

United States Environmental Protection Agency  
Region 5

IN THE MATTER OF:	)	
	)	NOTICE OF VIOLATION AND
Honeywell Analytics	)	FINDING OF VIOLATION
Lincolnshire, Illinois	)	
	)	EPA-05-06-13-IL
	)	
Proceedings Pursuant to	)	
the Clean Air Act,	)	
42 U.S.C. §§ 7413(a)(1) and	)	
(a)(3) <u>et seq.</u>	)	

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**NOTICE OF VIOLATION AND FINDING OF VIOLATION**

The Administrator of the United States Environmental Protection Agency (U.S. EPA) is issuing this Notice of Violation and Finding of Violation under Section 113(a)(1) and (a)(3) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(1) and (a)(3). U.S. EPA finds that Honeywell Analytics (Honeywell) in Lincolnshire, Illinois, is violating Title V of the CAA, 42 U.S.C. § 7661 et seq., its implementing regulations at 40 C.F.R. Part 70, and the Illinois State Implementation Plan (SIP), as follows:

**REGULATORY AUTHORITY**

1. On September 9, 1994, U.S. EPA approved 35 Ill. Admin. Code Part 218, Subpart F (Coating Operations) as part of the federally enforceable volatile organic material (VOM) emissions SIP for Illinois (59 Fed. Reg. 46562). On February 13, 1996, U.S. EPA approved a SIP revision request to tighten the existing rules for certain surface coating operations at 35 Ill. Admin. Code Part 218, Subpart F (61 Fed. Reg. 5511). These rules became effective April 15, 1996.
2. After April 15, 1996, 35 Ill. Admin. Code § 218.204 (Subpart F) requires that no owner or operator of a coating line shall apply any coating in which the VOM content exceeds the following limitations, as applied:

paper coating:

2.3 lb VOM/gal of coating (minus water and

any compounds which are specifically exempted from the definition of VOM).<sup>1</sup>

### Title V

3. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the Act, no source subject to Title V may operate after the time that it is required to submit a timely and complete application under an approved permit program, except in compliance with a Title V permit.
4. On March 7, 1995, U.S. EPA gave Illinois' Clean Air Act Permit Program (CAAPP) interim approval as a 40 C.F.R. Part 70 permit program. 60 Fed. Reg. 12478. The program was granted full approval effective November 30, 2001. 40 C.F.R. Part 70, App. A.
5. Section 504(a) of the Act, 42 U.S.C. § 7661c(a), 40 C.F.R. §§ 70.1(b) and 70.6, and Section 39.5 of the Illinois Environmental Protection Act require that each Title V permit include, among other things, enforceable emission limitations and standards as are necessary to assure compliance with applicable requirements of the Act and the applicable SIP.
6. C.F.R. § 70.5 and Section 39.5 of the Illinois Environmental Protection Act require that a source submit a complete permit application that, among other things, identifies all applicable requirements, certifies compliance with all applicable requirements, and contains a compliance plan for all applicable requirements for which the source is not in compliance.
7. Section 39.6 of the Illinois Environmental Protection Act prohibits any person from operating a CAAPP source without a CAAPP permit unless the complete CAAPP permit application for such source has been timely submitted to the Illinois Environmental Protection Agency (IEPA) or from violating any other applicable requirements.
8. Title V of the CAA, 40 C.F.R. Part 70, and Section 39.2 of the Illinois Environmental Protection Act

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<sup>1</sup> Prior to March 15, 1996, the emission limitation was 2.9 lb VOM/gal.

apply to any major stationary source that directly emits or has the potential to emit 100 tons per year or more of any air pollutant.

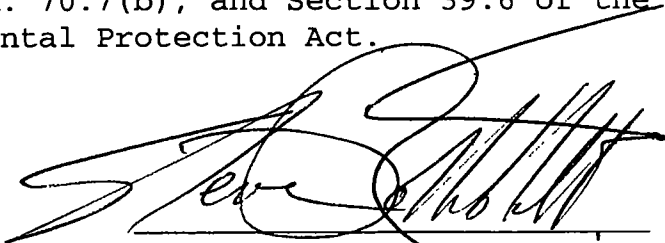
#### **HONEYWELL'S FACILITY**

9. Honeywell owns and operates a lab equipment assembly and paper coating facility (facility) at 405 Barclay Boulevard, Lincolnshire, Illinois 60069.
10. Honeywell is located in the Village of Lincolnshire, the Township of Vernon, the County of Lake and the State of Illinois.
11. The facility began operating in 1982.
12. The facility emits or has the potential to emit 100 tons per year or more of VOM.
13. The facility owns and operates ten dip tanks that coat spools of paper for toxic gas detection.
14. Emissions from the facility's coating lines are subject to 35 Ill. Admin. Code Part 218.204(c) in the Illinois SIP.

#### **VIOLATIONS**

15. At the facility, Honeywell has applied Chemcassette paper coatings that each have a VOM content exceeding the limitation of 2.3 lb VOM/gal of coating (minus water and any compounds which are specifically exempted from the definition of VOM), in violation of 35 Ill. Admin. Code § 218.204(c).
16. Honeywell failed to submit an application for, and obtain, a Title V permit for all applicable requirements, including 35 Ill. Admin. Code § 218.204, in violation of Section 502(a) of the Act, 42 U.S.C. § 7661a(a), 40 C.F.R. 70.7(b), and Section 39.6 of the Illinois Environmental Protection Act.

1/24/2006  
Date

  
Stephen Rothblatt, Director  
Air and Radiation Division

CERTIFICATE OF MAILING


I, Betty Williams, certify that I sent a Notice of Violation, No. EPA-05-06-13-IL, by Certified Mail, Return Receipt Requested, to:

James Monahan  
Vice President, Head of Technical Center  
Honeywell Analytics  
405 Barclay Blvd.  
Lincolnshire, IL 60069

I also certify that I sent copies of the Notice of Violation by first class mail to:

Julie Armitage, Acting Manager  
Compliance and Enforcement Section Bureau of Air  
Illinois Environmental Protection Agency  
1021 N. Grand Avenue  
Springfield, IL 62702

on the 25<sup>th</sup> day of January, 2006.

  
Betty Williams, Secretary  
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 1155 1287